

# Exhibit H

December 22, 2023 Email

**Schy, Levi R.**

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**From:** Cohen, Jonathan Z. <jcohen@ClarkHill.com>  
**Sent:** Friday, December 22, 2023 11:46 AM  
**To:** Richards, Joshua W. B.; Schy, Levi R.; Joseph McCool (JMcCool@mmwr.com); Kevin Siegel (kevin@kmslawgroup.com)  
**Cc:** Hamill, Patricia  
**Subject:** Doe v. Haverford College et al.

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Counsel,

On behalf of Non-Parties Robert Doe and Jane Doe, in response to the subpoenas issued by the Haverford Defendants on November 22, 2023:

With respect to Requests 1 and 2 in both subpoenas, subject to the General Objections and Specific Objections that Mr. and Ms. Doe served on December 6, 2023, they intend to produce responsive non-privileged documents within their possession, custody, or control following the entry of a suitable protective order (as agreed to in Doc. 56 at 10). We will send you our draft edits to the Haverford Defendants' proposed protective order under separate cover.

With respect to Requests 3 and 4 in both subpoenas, on the basis of the General Objections and the Specific Objections that Mr. and Ms. Doe served on December 6, 2023, they do not intend to produce any documents.

With respect to Requests 1, 2, and 4 in both subpoenas, Mr. and Ms. Doe do intend to serve an appropriate privilege log in due course, again following entry of a suitable protective order.

Please note that I will be on vacation all next week.

Thank you,  
Jonathan

**Jonathan Z. Cohen**

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